

NOTICE OF COMPLIANCE/NON-COMPLIANCE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Division of Environment

Waste Management Program

Initial Inspection: Yes NoFollow-up Inspection: Yes NoComplaint: Yes NoHazardous Waste: LDF() TSF() GEN() KG() SQ() UNV() NOT A GEN X OTHER()Used Oil: UOG X UOT() UOM() UOP() UOB()

Solid Waste: SLF() TRS() CDL() ILF() YWC() SWP() HHW() OBS() MTP() WTM() WTP() WTR() WTT()

TO: Panhandle Eastern Ape Line Company 2 / 18 / 10

985 RD 9D Facility Name Olpe KS 66865 Lyon

Address City State Zip Code County

KSD984972737

EPA Identification No.

Solid Waste Permit No.

This inspection was conducted to determine compliance with the state and federal solid and/or hazardous waste statutes and regulations.

☐ Violations As Follows☒ No Violations Identified

Citation

Description of Violation

☐ Other Comments/Concerns:

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within days of receipt of this notice a description of all corrective actions taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

Your response must be submitted to:

Kansas Department of Health and Environment
Southeast District Office
Waste Management Program
1500 W. 7th
Chanute, Kansas 66720-9701

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (620) 431-2390 or Bureau of Waste Management in the Topeka office at (785) 296-1600.

This Notice was prepared by:

W. Bishop A. PageDate 2 / 18 / 10

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed Name: Carl KruegerSignature: Carl KruegerTitle: EMS CoordinatorDate 2 / 18 / 10

BUREAU OF WASTE MANAGEMENT
BUREAU OF ENVIRONMENTAL FIELD SERVICES**COMPLIANCE INSPECTION CHECKLIST
HAZARDOUS WASTE COVER PAGE****General**☒ **Routine**☐ **Complaint**EPA/ ID/Permit No. KSD 984 972 737 Time 10:45 a.m. Date 02-18-10Facility Name Panhandle Eastern Pipe Line Company District SoutheastStreet 985 Road 90 City Olpe, KS ZIP 66865Mailing Address (if different than above) SameCounty Lyon Number of Employees 14Phone 620-475-3226 Fax 620-475-3226 e-mail carl.krueger@sug.comContact(s) Carl Krueger - EHS Coordinator Inspector(s) Wes PageType of Business Natural Gas Compressor StationOperating Hours and Days 7:00 a.m. to 3:30 p.m. Monday through Friday

Lat/Long Location Method: _____ Lat/Long Location Feature: _____

Latitude: (e.g. 37.57621) _____ Longitude: (e.g. -101.57621) _____

Has the Lat/Long been entered in the SW database? Yes ☐ No ☒**Hazardous Waste Inspection:**☒ Yes ☐ NoGenerator Classification: ☐ Closed/Inactive ☐ Small Qty. Generator ☐ EPA Generator
☒ Not a Generator ☐ Kansas Generator ☐ TransporterOther Regulated Activities: ☐ T/S/D Facility ☐ Tank System ☐ Subpart BB
(complete applicable checklist) ☐ Universal Waste ActivitiesHas the company declared any information/processes as trade secrets KSA 65-3447? No

If yes, explain: _____

If facility is closed/inactive, or has recently moved please provide a brief description. _____

Used Oil Activities: ☒ Yes ☐ NoDoes the facility have a total above-ground storage capacity of used oil (excluding containers less than 55-gallons) of more than 1,320 gallons? ☒ Yes ☐ No ☐ NA

If yes, then the facility is subject to SPCC requirements due to used oil activities.

Does the facility have a SPCC Plan? ☒ Yes ☐ No ☐ NA**Facility Used Oil Activities (Attach a checklist for each one marked):**☒ Generator ☐ Collection Center / Aggregation Point
☐ Transporter / Transfer Facility ☐ Used Oil Processor / Re-Refiner
☐ Used Oil Burner (Off-Spec Fuel) ☐ Used Oil Marketer**Attach all applicable checklists.**

HAZARDOUS WASTE GENERATOR COMPLIANCE INSPECTION CHECKLIST

WASTE STREAM TABLE

(List all hazardous wastes first, followed by solid wastes.)

Waste Description or Process	Hazardous Waste Codes (or universal, recycled, exempt, or non-hazardous)	Waste Determination Method (process knowledge or analytical data)	Waste Amount Generated Per Month	Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (name of TSDF, MSWLF, recycler, etc.)
Two 30-Gallon Parts Washers – One Located In The Office/Shop Area And One Located In Main Engine Room 2	Not Applicable	Not Applicable	50-Gallons Every Three Months	None	Not Applicable	Safety-Kleen Continued Use Program
Rags (Generated Throughout Facility)	Exempt	Knowledge of Process	200 Every Week	None	Not Applicable	Cintas
Basement Sludge (Generated From Main Engine Room 1 and 2)	Non-Hazardous	Analytical	1-2 55-Gallon Drums Every Year	None	Not Applicable	Heritage Crystal Clean
Used Oil (Generated From Main Engine Room 1 and 2)	Non-Hazardous	Knowledge of Process	100 Gallons Every Month	800 Gallons	Not Applicable	Safety-Kleen
Used Oil Filters (Generated From Main Engine Room 1 and 2)	Non-Hazardous	Knowledge of Process	135 Every Year	None	Not Applicable	Safety-Kleen
Scrap Metal (Generated Throughout Facility)	Non-Hazardous	Knowledge of Process	1,000 Pounds Every Six Months	Unknown	Not Applicable	J.C. McNeese
General Trash (Generated Throughout Facility)	Non-Hazardous	Knowledge of Process	≤ 12 Cubic Yards Every Week	Unknown	Not Applicable	Waste Management

RCRA Compliance Evaluation Inspection Summary

PANHANDLE EASTERN PIPE LINE COMPANY

985 Road 90
Olpe, Kansas 66865

EPA ID No.: KSD 984 972 737

Inspection Date: February 18, 2010

KDHE Inspector: Wesley A. Page
Bureau of Environmental Field Services (BEFS)
Southeast District Office (SEDO)

1.0 INTRODUCTION

On February 18, 2010, I conducted a routine compliance inspection at the facility referenced above to determine compliance with the State of Kansas waste regulations. The focus of the inspection was to identify types of wastes generated, points of waste generation, methods of waste management, and review relevant documents. This inspection was conducted under the authority of Kansas Administrative Regulation (K.A.R.) 28-31-12.

The facility is a natural gas compressor station. The facility consists of six buildings located on approximately 20 acres. There is a main office/shop building. Located north of the main office/shop building is an auxiliary building. North of the auxiliary building is the main engine room 1. West of the auxiliary building is a storage building. West of the storage building is the turbine building. And the last building, the main engine room 2 is located north of the turbine building.

Based on the waste generation rates identified during the inspection, the facility is not currently regulated as a generator of hazardous waste.

2.0 PREVIOUS INSPECTIONS AND VIOLATIONS

November 26, 2001 Inspection:

1. K.A.R. 28-31-4(e)(4). Failure to have placards.
2. K.A.R. 28-31-4(d). Failure to use correct generator name and/or address on nine manifests.
3. K.A.R. 28-31-14. Failure to include manifest number on four LDR forms.

4. K.A.R. 28-31-4(g)(4). Failure to follow written inspection schedule for emergency equipment.
5. K.A.R. 28-31-4(g)(4). Failure to familiarize local hospital in accordance with 40 CFR 265.37(a)(4).
6. K.A.R. 28-31-4(g)(4). Failure to describe emergency actions for fires involving hazardous waste.
7. K.A.R. 28-31-4(g)(4). Contingency plan does not describe arrangements in accordance with 40 CFR 265.52(c).
8. K.A.R. 28-31-4(g)(4). Contingency plan does not include brief outline of the capabilities of emergency equipment.
9. K.A.R. 28-31-4(g)(4). Contingency plan does not include evacuation routes.
10. K.A.R. 28-31-4(c)(1). Inaccurate notification.
11. K.A.R. 28-31-4(g)(4). Failure to maintain written job descriptions.

3.0 CHANGES SINCE PREVIOUS INSPECTION

The facility was previously inspected November 26, 2001 as an EPA Generator. The facility had previously notified as an EPA Generator and facility personnel requested that the facility be inspected as an EPA Generator. After concurrence with the Topeka Office, the facility was inspected as an EPA Generator. After the inspection, and the facility receiving violations pertaining to an EPA Generator, the facility re-notified as a Kansas Generator. Since that inspection, the facility has eliminated all painting wastes and has enrolled in Safety-Kleen's continued use program.

4.0 INSPECTION

I arrived at the facility at 10:45 a.m. and met with Carl Krueger, Environmental Health and Safety Coordinator. I presented my credentials and discussed the purpose and procedures of the routine compliance inspection. Mr. Krueger explained the facility operations and described each of the facility's waste streams. I then conducted a walk-through inspection of the interior and exterior of the facility. Mr. Krueger accompanied me during the walk-through inspection.

Office/Shop Area

No hazardous waste is generated in the office/shop area. One of the facility's two parts washers enrolled in Safety-Kleen's continued use program is located in the shop area.

Auxiliary Building

No hazardous waste is generated in the auxiliary building.

Main Engine Room 1 Building

No hazardous waste is generated in the main engine room 1 building. According to Mr. Krueger, main engine room 1 building is out of service and no longer used.

Storage Building

No hazardous waste is generated in the storage building.

Main Engine Room 2 Building

No hazardous waste is generated in the main engine room 2 building. The second of the facility's two parts washers enrolled in Safety-Kleen's continued use program is located in the main engine room 2 building.

Turbine Building

No hazardous waste is generated in the turbine building.

Perimeter

No environmental concerns were observed around the perimeter of the buildings.

Document Review

Upon completing the walk-through inspection, Mr. Krueger provided me with the requested documents for review. Documents reviewed included: Safety-Kleen's reuse program, notification forms, analytical results, and the facility's spill prevention, control, and countermeasure (SPCC) plan.

4.0 DISCUSSION OF VIOLATIONS

No violations were cited.

6.0 EXIT CONFERENCE

Panhandle Eastern Pipe Line Company

KSD 984 972 737

Inspection Date: February 18, 2010

Page 4 of 4

I met with Mr. Krueger to discuss the results of the inspection. I explained that no violations were observed. I provided Mr. Krueger with the Bureau of Waste Management (BWM) website address and briefly explained some of the information available on the website. I also gave Mr. Krueger a copy of the Bureau's Compact Disk (CD) with all BWM handouts and examples. At the conclusion of the exit conference, I provided Mr. Krueger with a copy of the Notice of Compliance (NOC). I informed Mr. Krueger that violations could still be identified once the information gathered during the inspection had been reviewed.

7.0 LIST OF HANDOUTS PROVIDED TO FACILITY

Compact Disk (CD) with all BWM handouts and examples

8.0 LIST OF ATTACHMENTS

None

9.0 SIGNATURE OF AUTHOR/INSPECTOR

This report was prepared by:


Wesley A. Page